



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JJD
F. #2020R00632

271 Cadman Plaza East
Brooklyn, New York 11201

March 16, 2025

TO BE FILED UNDER SEAL

The Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
920 Federal Plaza
Central Islip, New York 11721

Re: United States v. Cesar Lopez-Larios
Criminal Docket No. 20-577 (JMA)

Dear Judge Azrack:

The government respectfully submits this letter, under seal, to request that the Court continue to keep the government's March 11, 2025 letter, the Court's March 11, 2025 order, and the Court's March 12, 2025 order (collectively, the "Sealed Documents") under seal, at least until March 17, 2025 at 12:00 p.m., when the government will provide the Court with a further update.

As the Court will recall, the government previously requested that the Sealed Documents be filed under seal due to operational concerns, which extended far beyond the defendant Cesar Lopez-Larios, who was the subject of the Sealed Documents and was transferred to immigration custody and, as we were informed earlier this morning, removed to El Salvador. It is the government's understanding that the operation involves not just the Department of Justice, but multiple components from the Department of Homeland Security and other agencies, numerous subjects, and that the operation is on-going and incomplete. The government has been specifically directed by Department of Justice leadership to request that the Sealed Documents remain under seal until the operation is complete or as otherwise directed because the disclosure of the details in those documents could compromise the operation and officer safety. The government recognizes that there is some media reporting regarding the operation, including a possible (albeit inaccurate) reference to this case, but it does not contain the defendant's name or any specific information, which the Sealed Documents contain. Accordingly, the government respectfully requests that the Court maintain the Sealed Documents under seal at this time and permit the government to submit a further update to the Court by 12:00 p.m. on March 17, 2025.

Finally, the government respectfully requests that this letter also be filed under seal because of the references it contains to the on-going operation, the scope and nature of which is not fully known, which, if disclosed, could compromise the safety of the officers transferring the

defendant and other subjects. See United States v. Amodeo, 71 F.3d 1044, 1050 (2d Cir. 1995) (sealing appropriate to protect law enforcement interests). The government respectfully submits that this request is narrowly tailored and appropriately balances the government's compelling interests with the public's qualified right to access this document. See United States v. Doe, 63 F.3d 121, 128 (2d Cir. 1995); United States v. Haller, 837 F.2d 84, 87 (2d Cir. 1988).

Respectfully submitted,

By: /s/ John Durham

John J. Durham
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Eastern District of New York

cc: Jeffrey Pittell, Esq. (By email)